148548



# Preliminary Assessment

Bendix - Teterboro Facility
Route 46
Teterboro, NJ 07608
Bergen County
NJD078714433

Hours Worked: 37

# BENDIX-TETERBORO FACILITY ROUTE 46 TETERBORO, BERGEN COUNTY NJD078714433

Bendix Corporation is located on Route 46 in Teterboro, Bergen County. Operations at this facility consist of research, engineering design, and manufacturing of discrete aerospace electronic systems for both the military and commercial sectors. Manufacturing processes include ultra-high precision machining of metal parts from bar stock and metal coating manufactured by other supplies, deburring by tumbling, degreasing, painting, plating, printed circuit board fabrication and assembly operations.

Bendix formerly operated as a treatment, storage, and disposal facility. In July 1985, they submitted a closure plan for their hazardous waste storage tanks. The plan was approved, the facility was inspected, and it was determined that the tanks had been closed according to regulations. Bendix currently operates only as a generator of hazardous waste.

Hazardous substances are used and generated during routine operations at Bendix. During cleaning operations for the manufacturing processes, organic solvents and cleaners which may contain organics regulated under metal finishing, are used. Metal hydroxide sludge is generated as a precipitate from Bendix' wastewater treatment facility. Concentrated plating bath solution is generated when the solution becomes contaminated and is no longer suitable for plating. Whate solvents are generated from the degreasing and painting operations. Waste oils are generated from the lubrication of parts and replacement of the cooling oils in the sump pumps. Electroless copper is generated from the plating operation. The wastewater treatment facility treats diluted waste rinse water from the plating and printed circuit board operations where metals are precipitated and a metal hydroxide sludge is generated.

Two incidents occurred at Bendix which will require further investigation. On June 5, 1984, during routine excavation for a new building, an oily liquid mixed with water began to seep from a portion of the excavated area. The excavation was in the vicinity of an underground hexane tank which was no longer in service. Bendix took immediate action to retain the liquid and instituted a groundwater monitoring plan. The monitoring wells were drilled about five feet into a shallow aquifer. Although hexane was not detected in monitoring results, slightly elevated levels of organics and metals were found. Contaminated soil may also remain from this incident. A separate incident involved transformers that were being shipped offsite and were leaking PCB's onto the ground. They were leaking as they were loaded onto the truck to be transported to a hazardous waste disposal area. The truck stopped before leaving Bendix property and the leaking was stopped. Bendix employees performed initial clean-up and covered the spill areas with asphalt sealer. Sealing was not effective as a cleanup measure, it only obscured the spills. Contamination may still exist in these areas.

Bendix has illegally burned wood, grease, and magnesium in open fires at this facility. There is no evidence of illegal burning since 1967 but there is potential for fire from the materials present at this site.

Bendix is regulated under NJPDES permit number NJ0002097 (discharge to surface water). They are permitted to discharge pretreated industrial wastes into Berry's Creek and the Bergen County Utilities Authority via Teterboro sewers. If the discharge is contaminated, there is a potential for contamination of surface water.

Air discharges are also regulated by NJDEP air permits. Unregulated releases to air have been documented at this facility. Violations are on file with the Bergen County Health Department, NJDOH, and NJDEP.

Silty sands and clay overlie the Brunswick Formation in this area. Groundwater can be found between 10 and 100 feet in this area. There is a shallow aquifer in the sands at the surface. Monitoring wells are drilled approximately five feet into this aquifer. Monitoring results have shown organic and metal contamination in this aquifer. Since there is documented contamination of soil and the shallow aquifer, there is a potential for contamination of the deeper aquifer.

Several municipalities draw their drinking water from the Brunswick Formation within three miles of Bendix. Public supply wells are generally drilled to abaout 400 feet. Teterboro, Garfield, Lodi, and Wallington are potentially affected if there is drinking water contamination. The population potentially affected is 84,610.

I recommend this site be assigned a high priority because of the documented soil and groundwater contamination, and the potential for drinking water contamination. Soil sampling should be conducted to determine if there is residual contamination. Monitoring wells should be drilled into the deeper aquifer. If groundwater contamination is discovered, sampling of public supply wells may be warranted.

Submitted by:

Christina Holstrom
HSMS IV
Bureau of Planning and Assessment

LIDENTIFICATION

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Bendix - Teterboro Facility		Route 46		
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Bendix		Route 46		
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Teterboro		NJ   07608	201 288-2000	
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	B. UNCONTROLLE	D WASTE SITE ICEICUA	OATE RECEIVED: WO-T- C	AT YEAP C. NONE
IV. CHARACTERIZATION OF POTENTIAL HAZARD		I the second		
U NO	O B. EPA ( CAL HEALTH OFFIC		C. STATE 0. OTHER	CONTRACTOR
	CTOR NAME(S): _			7.5
02 SITE STATUS (Coses acre)  X A. ACTIVE D B. INACTIVE D. C. UNKNOWN	DE YEARS OF OPERA	in the state of	ently  ating UNKNOW	N.
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWM, O		and the Manager		
PCB's, metals, hexane, organics				
	Att	achment A & I	<b>3</b>	
04 DESCRIPTION OF POTENTIAL HAZARO TO ENVIRONMENT ANDION			或30m,第2m部第3位数	
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IL WASTE	STATES, QUANTITIES, AND CHARACTE	PICTICE WA	STE INFORMATION NJ D0787144
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(PSD)	00000000		· · · · · · · · · · · · · · · · · · ·
(OCC)	rub s	Unknown	
iOC	OTHER ORGANIC CHEMICALS		
ACO	ACIDS		4400
BAS	BASES		Galdona
CMES	HEAVY METALS	1	
CATEGORY	US SUBSTANCES (See Access in the Books)		The state of the s
	02 SUBSTANCE NAME	OJ CAS NUMBER	OA STORAGE OFFICE
	PCB's	1336363	Sp 11 led OS CONCENTRATION CONCENTRA
	Hexane	927500	The state of the s
OCC II	Methylene Chloride	75092	Underground tank Unknown
IES A	Arsenic	7440382	See
	Coluene	108883	Unknown
CC 1	Crichloroethylene	79016	Unknown
CC 1	,1 Dichloethane		Unknown
CC 1	,1,1 Trichloroethane	75343	Unknown
CC V	7 DW   Ob   mark 1	71556	Unknown
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EPA FORM 2070-12 (7-81)

#### POTENTIAL HAZAHOOUS WASTE SITE PRELIMINARY ASSESSMENT

L IDENTIFICATION OI STATE OF SITE NUMBER D078714433

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS IL RAZARDOUS CONDITIONS AND INCIDENTS CI ALLEGED 02. OASERVED IDATE R/R4 01 X A. OROUNGWATER CONTAMINATION DA NARRATIVE DESCRIPTION 03 POPULATION POTENTIALLY AFFECTED: There was dbcumented groundwater contamination from organics and metals. There is potential for contamination from PCB's and hexane which leaked onto the ground. Attachment C POTENTIAL C. ALLEGED 02 LT OBSERVED (OATE. DIXA. SURFACE WATER CONTAMWATION 03 POPULAT ON POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION There is potential for surface water contamination to Berry's Creek 3/4 mile south of Bendix since Bendix discharges wastewater to this creek. Attachment D 2 POTENTIAL 02 TOUSERVEO IDATE 01 C CONTAMINATION OF AIR 03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION There have been documented releases to the air and there is a potential for further releases from the open top vapor surface cleaners. Attachment E & F E POTENTIAL 01 XD FIRE EXPLOSIVE CONDITIONS 02 C OBSERVED IDATE: 04 NARRATIVE DESCRIPTION 03 POPULATION POTENTIALLY AFFECTED: Bendix has illegally burned wood, grease, and magnesium in open fires at this facility. There is no evidence of illegal burning since 1967 but there is potential for fire from the materials present at this site. Attachment G S POPULATION POTENTIALLY AFFECTED 04 NARRATIVE DESCRIPTION There is no potential for the public to contact these substances since the facility is fenced and guarded. Employees could contact some substances. Windshieid Survey POTENTIAL DS OBSERVED IDATE: OI DE CONTAMENATION OF SOIL 04 NARRATIVE DESCRIPTION 03 AREA POTENTIALLY AFFECTED: There was observed soil contamination in the vicinity of an underground hexane tank. There is also a potential for soil contamination if the transformers were leaking PCB's onto exposed soil. Attachment H&I -ALLEGED 02 (1 OBSERVED IOATE 01XO DRINKING WATER CONTAMINATION 84610 04 NARRATIVE DESCRIPTION 03 POPULATION POTENTIALLY AFFECTED. Teterboro does not have any private potable wells, but several public supply wells exist within three miles of this site. If there is groundwater contamination, there could be drinking water contamination. \* Teterboro Building Inspector POTENTIAL ALLEGED 02 O OBSERVED IDATE 01 X N. WORKER EXPOSURE/INJURY 3000 04 NARRATIVE DESCRIPTION 03 WORKERS POTENTIALLY AFFECTED: \_\_ There is a potential for worker exposure during the degreasing operations pr if workers contact any discharges. Attachment J 1 ALLEGED X POTENTIAL 02 LI OBSERVEDIDATE 01 X1. POPULATION EXPOSURE/INJURY 84610 04 NARRATIVE DESCRIPTION 03 POPULATION POTENTIALLY AFFECTED: There is a potential for population exposure through groundwater and drinking water contamination.

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## POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

L IDENTIFICATION
OF STATE OR STREET
NJ D078714433

PART 3-DESCRIPTION OF HAZAROOUS CONDITIONS AND INCIDENTS

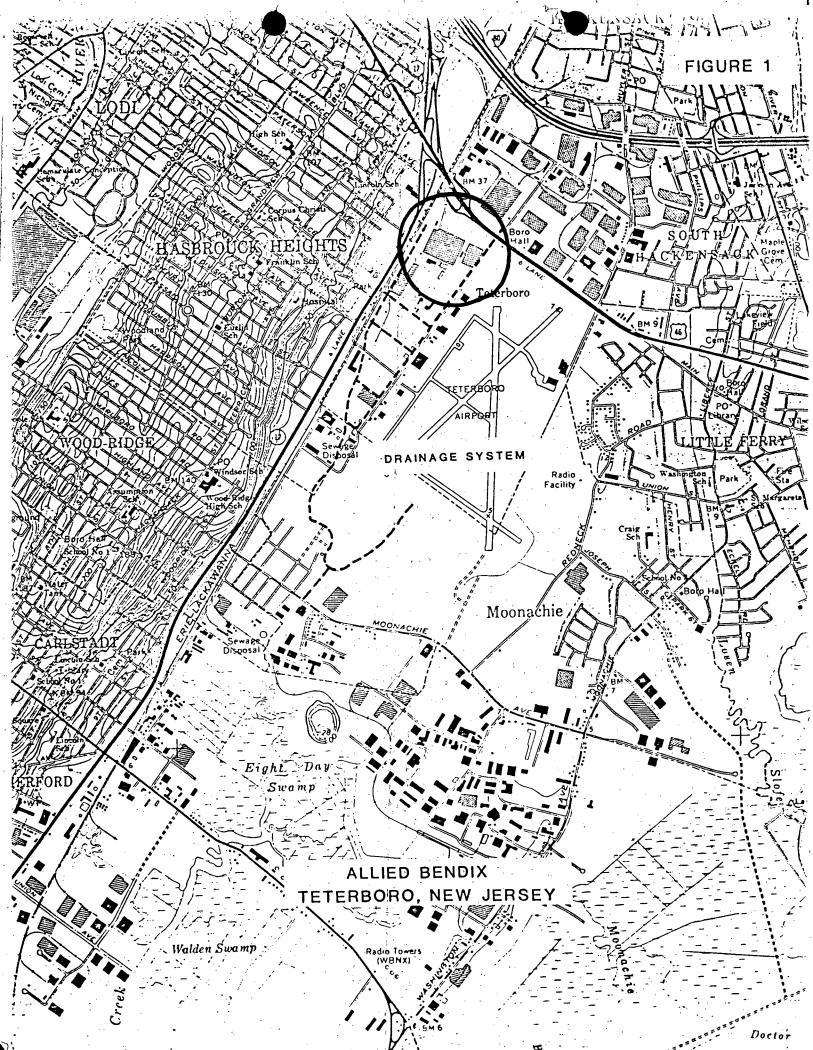
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IL HAZAROOUS CONDITIONS AND INCIDENTS	02 O OSSERVEO IDATE: POTENTIAL DALLEGEO
01 XJ. DAMAGE TO FLOAA 04 NARRATIVE DESCRIPTION	
There is a potential for damage to	flora if there is contaminated soil present.
	Attachment H&i
01 X N DAMAGE TO FAUNA 04 NARRATIVE DESCRIPTION PRODUCT ACCOUNTS ACCOUNTS	02 O OSSERVEO IDATO POTENTIAL CO ALLECED
	aquatic fauna since Bendix discharges waste-
water into Berry's Creek.	Attachment H&I
01 XL CONTAMINATION OF FOOD CHAM 04 NARRATIVE DESCRIPTION	02 O OSSERVED (DATE:
There is a potential for damage to	the food chain if metals are discharged into
Berry's Creek.	Attachment C
01 MM UNSTABLE CONTAINMENT OF WASTES	02 COBSERVEO (DATE 6/5/84 ) C POTENTIAL C ALLEGEO
02 POPULATION POTENTIALLY AFFECTED:	04 NARRATIVE DESCRIPTION
	g into an excavated pit in the vicini ty of an
funderground hexane tank.	Attachment K
01 N DAMAGE TO OFFSITE PROPERTY	02 O OBSERVED (OATE:) X POTENTIAL ALLEGED
There is a potential for damage to	offsite property from groundwater contamination.
	Attachment C
04 NARRATIVE DESCRIPTION	
There is a potential for contamina	tion of sewers, storm drains or wastewater
treatment plants since Bendix disc	harges wastewater to the Bergen County Utilities
Authority and Berry's Creek.	Attachment D
01 C P ILLEGAL/UNAUTHORIZED DUMPING 04 NARRATIVE DESCRIPTION	02 OSSERVEO (DATE: ) O POTENTIAL O ALLEGED
No illegal or unauthorized dumping	was conducted at this site.
CS DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLE	OFD HAZARDS
III. TOTAL POPULATION POTENTIALLY AFFECTED:	84610
IV. COMMENTS	
스펙트를 관계하는 함께 시스 [편리] 가능하는	
V. SOURCES OF INFORMATION (Cor species information of g. same men	autor angine, reportal
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Joan Piggot Metro DHWM/BFO	

#### PRELIMINARY ASSESSMENT FILE SEARCH

NJDEP

Bendix

DIVISION	OF WATER RESOURCES:
Α.	Enforcement Constant Sie 9-10-87 Eleanor File
В.	Groundwater 9/23/87 Nofile 2-8427
. c.	Other
DIVISION	OF WASTE MANAGEMENT:  CENTER FILES - MIXE GENVISO -9-18-87, NO FILE
Α.	HSMA Metro 2016693960 9-8-87 FILE 026204 (JOHN)
	Enforcement
<b>c.</b>	Solid Waste
ENVIRONME	ENTAL QUALITY:
Α.	Air Pollution Metro-Vanessa 9-24-87 File 201669-3935
В.	Pesticides
<b>c.</b>	Other
DIVISION	OF FISH AND GAME:
OFFICE OF	SCIENCE AND RESEARCH:
Α.	Industrial Survey
В.	Other
N.J. DEPA	RTMENT OF HEALTH:
	Alison Teoger 91/28/87 292-5614 No File
LOCAL AUT	HORITIES:
Α.	Health Department Teterboro 201 288-2850 9 23-87 Mary File
В.	Town or County Clerk
UNITED ST	ATES COVERNMENT:
Α.	EPA
В.	Other



## MEMO

## NEW JERSEY STATE DEPARTMENT CONVIRONMENTAL PROTECTION

TO Arnold Schiffman, Administrator, Water Quality Management
PROM_Bureau of Industrial Waste Management DATE OCT 24 1986
SUBJECT Issuance of Final NJPDES Permit No. WJ000 2097 Type: 50
Major Minor New Renewal Existing withou permit Modification
Attached is the Final NJPDES Permit package for:  Allied Bendix Corp.
US Route 46
Teterboro NJ 07608
The 30-day comment period has expired.  We understand that we did not receive any comments.
Comments were received and are included/addressed in the accompanying material.
Please return the permit package after your review/decision.  Thank you.
Environmental Engineer or Specialist
fw Section Chief  PM
Bureau Chief

Attachment

			ERMIT DISTR	IBUTION FOR.
Beviewer ()ac	100	res		seccion Pretreatment
Date Submitted to OPA_				Permit # NJ 000 2097
Applicant Allied		Oix Co	cp.	Date Mailed OCT 24 1986
U.S. Teter		NJ 0	7608	
	BC/-D		7000	Discharge Category Code (L)
Same 9				
Becipicat	Final Permit	Cover Letter		Addrecses/Reaerks .
Central File	<b>x</b>	x		
Applicant	Z	*		(address above)
Applicant's Agent				
Mayor	X	X		
Planning Board				
Health Board				
Beverage Authority (Specify)				Bergen County Utilities Authority Box 122 Fat & Mehrhut R) withe Ferry NT 07643 M Mizerek Att Mr. Steven M Mizerek
Anjec				
Baforcenent Metro Region #	<b>X</b>			Peter T Lynch, Chref
Technical Reviewer	x			Cary Torres
Chron File		:		
OPA -	X	2	•	
BPA				
Bureau's Chron File				
FR COM	X	人		Mr. William Hinschef
			1 1 1 1 1 1 1 1 1 1	

William Hanchefsky



PROGRAM:

CERTIFIED MAIL

# DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF ENVIRONMENTAL QUALITY JOHN FITCH PLAZA, CN 027, TRENTON, N.J. 08625



#### ORDER

	Identification No
	Ob and
	Violation Occurred on Premises Known As:
Bendly Corporation	
7-1-0 846	Route #46, Teterboro, Lots 1, F.A, 2A,
Teterhoro, New Jersey U/000	Route #45, Tetersoro, Lotto y, New Jersey 2.Al., Block 4, Bergen County, New Jersey
William Agee, President	
	made pursuant to the provisions of
The New Jersey Department of Environmental Protection has determined by the Political Control	ermined by investigation the New Jersey Administrative Code,
The New Jersey Department of Sarch 23, 1983.	you did violate 16 Section 16.4(e)/
Title 7, Chapter	face cleaners (#11, 13, 14, 15, 16, 19 aud 20
Title 7, Chapter seven open top vapor sur The investigation disclosed each equipped with a local (Lip) exhaus	rface cleaners (#11, 13, 14, 15, 16, 19 and 20 er ventilation system venting uncontrolled
The investigation disclosed with a local (Lip) exhaus	TO VEHICLE OF THE PROPERTY OF
directly to atmosphere.	
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그는 그에게 이번 살아왔다. 사람들은 아니라 중요하는 사람들은	
	the promises owned leased, operated or maintained
THE STAN ORDERED to cease violation of said Sul	ochapter on the premises officer
YOU ARE HEREBY ORDERS 3, 1983	bchapter on the premises owned, leased, operated or maintained
by you on or before 26:2C-14.1	entitled to an administrative hearing if aggrieved by this Order.
Under the provisions of 14.3.3.  If entitled to an administrative hearing you must make writter	application to the Department within days from receipt
an administrative hearing you must make writter	1 application to the
of this Order.	ld Offlea
Should you have any questions, contact -201-048-207	
Snould you make with a	
	a Quita
	nomal Agriculture
Hay 3, 1983	Thomas A. Pluta, assistant
Dated:	Enforeement Branch
A TALL OF BRIDGE	
Newark Field Offica	HOROTE CONTRACTOR AND

#### AIR POLLUTION CONTROL CODE

#### FIELD RECORD OF VIOLATION

DATE	7 65 87 TIME AT SITE 945 p.m. 1215 p.m.
	E HEALTH DISTRICT NEWARK COUNTY BERGEN
STAT	E HEALTH DISTRICT COUNTY DEROST
Sec. A	FULL BUSINESS NAME BENDIX CORP
	MAILING ADDRESS ROUTE 4-6 TETERBURD N. J 07608  No. Street City Zip Code
·	TYPE OF OWNERSHIP:   Individual   Partnership   Corporation   Municipal   Type
	NAME OF OWNER, PARTNERS, OFFICERS, OFFICIALS WICCIAM AGEE, PRESCRIPTION
NO	201-288-2000
SON	THE
PER	PERSONS INTERVIEWED DOUG GABRIECSEN, DIRECTOR OF AIFE.
	PERSON-AUTHORIZED-TO-RECCIVC-PROCESSCS MIA HOOFFL WANAGER
:	MAILING ADDRESS
	No. Street City Zip Code REMARKS:
	ALMARO.
See. B	ROUTE 46 TETERPORO
. <u> </u>	LOCATION ADDRESS ROUTE 46 TETERBORD  No. Street City
NOI.	(Show details on reverse side) Book Plate Lot 1.A Block 4
ATI [A]	PREMISES OCCUPIED AS:
22	OWNER BENDIX CORPORATION Street
	OWNER BENDIX CORPORATION  Name  US ROUTE 46 TETERGURO N.T City 07608
Sec. C	CODE REFERENCE: None 727 Section(s) 16.4 Paragraph(s) 2-7
	DETAILS AT THE SITE ARE SEVEN OPEN TOP VAPOR SURFACE
	CLEANERS (#11, #13, #14, #15, #16, #19 AND # 20 \$ EACH FQUIRGED
	WITH A LOCAL (LIP) EXHAUST VENTILATION SYSTEM - USNINE
	UNCONTROLLED DIRECTLY TO ATMOSPHERE. SEE ATTACHED SHEET
O.S.	CISTING SOCUENTS USED AND OPERATIONAL DETAILS FOR FACH UNIT
ATI	
DETAILS OF VIOLATION	
0-	REMARKS *- COMPANY IDENTIFICATION NUMBERS
	$\sim$ 1.137
	RECOMMENDED ACTION ORDER 4
	PIAN OKEM

(OVER)

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NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF ENVIRONMENTAL QUALITY

BUREAU OF FIELD OPERATIONS

Horn DEO-062
10/84
MUST & COMPLETED
PLE DATE (UDICATED)

# FIELD INVESTIGATION ASSIGNMENT REPORT

TYPE OF INVESTIGATION REQUIRED	INSPECTOR ASSIGNED (Code No.)	DATE ASSIGNED	REQUIRED COMPLETION DATE	ACTUAL COMPLETION DATE	COUNTY	NO. SUBCHAPTER	ER UNITS/	INSPECTOR'S INITIALS
☐ COMPLAINT ☐ ORDER/NOP COMPLIANCE ☐ APEDS ☐ OTHER	660	05.11-87	2-29-87	2/28/87	Buch	3 6 6 75	282	Q'A
COMPLAINT Date Rec'd		Tel. No.		Name		5 3 32-c	2-6 73	
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Recorded by

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NEW JERSEY STATE DEPARTMENT OF HEALTH a.m. , \_\_TIME AT SITE. p.m. STATE HEALTH DISTRICT COUNTY\_\_\_\_ FULL BUSINESS NAME Sec. A Zip Code TYPE OF OWNERSHIP: NAME OF OWNER, PARTNERS, OFFICERS, OFFICIALS TITLE Individual\_ Partnership\_ Corporation\_\_\_\_\_ Municipal (type)\_ Person(s) interviewed\_ Person authorized to receive processes, REMARKS: have a system the day the try on a Sec. B LOCATION ADDRESS\_ (Show details on reverse side) Book Plate Will E Lot Premises occupied as: Owner Paragraph(s). Section(s)\_\_\_ **CODE REFERENCE** Chapter(s), Sec. C RECOMMENDED ACTION These backs.

Signed

Attachment G

(OVER)

8. Agriculture (Includes farming tick

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#### MEMO

# NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

FILE

TO Sp	ill file	through	Dave Long	street		DATE	10/22/85	
Say A-	-home D	Falcone	- ONE					

SUBJECT Bendix PCB oil spill (incident # 85-10-19-02M)

#### BACKGROUND:

Please be advised that a spill investigation was performed at the above facility on 10-21-85. I arrived at approx. 11:00 hrs., and met with Bill Hooper. The inspection was the result of a anonymous complaint that transformers being shipped off site were leaking oil into the ground and not properly cleaned up. (see attached spill sheet)

- The facility is located off Rt. 46 in Teterboro, NJ. Their EPA ID # is NJD078714433 (T.S.D. status).

#### INSPECTION AND DISCUSSIONS:

The transformer pad where the three 750 gal. transformers were originally, was inspected and some oil soaked stones were observed and ordered removed.

- The tranformers were first off-loaded of PCB oil-278ppm, 299 ppm, and 561 ppm.
- The oil was shipped via registered hauler to PPM in Georgia (2250 gals).

Mr. Hooper stated that he had observed the tranformers "weeping", prior to their decommissioning and had arranged to have the pad cleaned by Direct Environmental Services. Approx. 60 lbs. of cleanup waste from this operation was sent to General Electric Co. along with the empty transformers (Tomawanda, NY).

After the tranformers were loaded onto the flatbed truck, they began to leak as they were taken to the other side of the plant to be weighed. After they were were weighed, the truck was pulled to the side and the leak was stopped by re-positioning the transformers and rebolting the covers. The subsequent cleanup required three 50 lb. bags of vermiculite, and was done by Bendix employess.

- Approx. 400 lbs of cleanup waste was drummed and stored in the Haz. Waste storage area.
  - The area where the spills occurred was ther covered with an application

Attachment I

of asphalt sealer by Mr. Joseph Sinisi, a local contractor The oil could be seen bleeding thru the sealer.

Mr. Hooper stated that the area where the spills occurred was covered with sealant (effectively hiding the visible evidence of the spills) in order to "protect the environment". There were radio weather reports indicating rain and he did not want to risk PCB's running off into the storm system. I stated that he still had PCB's to cleanup in this area, now mixed with asphalt sealant. I suggested he contact Direct Environmental again and have them clean the area using the proper solvents and caustics, (in addition to the oil-soaked stones in front, and the trail of drips that connected the two areas and the scale.).

Mr. Hooper stated that he believed that the amount of PCB oil spilled did not warrant notification of DEP or EPA. I corrected his misperception and gave him an N.O.V. for the spill and failure to notify, (see attached along with the manifests.)

#### CONCLUSIONS AND RECOMMENDATIONS:

- Approx. 10-20 gals. of PCB oil were spilled.
- According to the complaintant, the truck driver (Hazmat Env. Group) refused to leave the property till the leaks were stopped, forcing this writer to conclude that the company handled this matter improperly from the beginning when the transformers were lst discovered "weeping" to the end when they sprayed sealant over the stains, tire tracks, and drips to obscure them.
- Issue N.O.V. for 7:26-7.4 (A) 4 vii

Failure to properly fill out a Manifest; specifically improper waste IB #.

Max. fines recommended.

APF: iw



#### Guidance Systems Telephore, M.J. 07808 **Division**

Tel (201, 288-2000)

The Bendix Curporation

N. J. Department of Environmental Protection Bureau Air Pollution Control 1100 Raymond Boulevard Newark, New Jersey 07102

April 13, 1983

Attention: Mr. Robert H. Jaggi

Reference: NJAC 7:27-16.1 Ex Seq.

Bendix Open-Top-Surface Cleaners

Gentlemen:

Pursuant to your March 23, 1983 visit to the Bendix Teterboro Facility for a compliance review of its open-top-surface cleaning operations (Vapor Degreasers) subject to New Jersey Administrative Code Title 7 Chapter 27, Sub Chapters 16 and 17, and our subsequent communications, we are enclosing the equipments' physical data package recently requested by the Department and a brief overview of our present environmental protection measures including additional proposed action items.

#### OVERVIEW

Bendix continuously reviews the subject codes for revisions and as they may pertain to its open-top-surface cleaning operations using volatile organic compounds (VOC solvents). It also reviews both OSHA and NIOSH work place safety codes in the use of these VOC solvents. Predicated on these codes, Bendix has provided over the years both safe work place areas and procedures for its employees in the use of open-top-surface cleaners. This was most evident in recent air sampling test of these work areas performed by IHI-KEMRON, environmental consultants and hygienists, whose certified test reported a work place contaminate level for VOC of less than 0.3 PPM.

However, literal interpretation of recent changes in the codes, which in part exclude rim exhaust systems and their enforcement, most certainly would result bdth in a breaching of work place safety, increased financial burden in abatement equipment and potential compensation cases.

An Equal Opportunity Employer M/F



N. J. Department of Environmental Protection Newark, New Jersey April 13, 1983

Bendix notes the foregoing relevant information because it also recognizes the Department's admirable goal to provide workable standards to limit emissions of VOC which contribute significantly to air pollution. Bendix continuing with this premise offers its own environmental protection plan, to reduce in excess of 50% its already limited emissions of VOC, for the Department's approval.

#### ENVIRONMENTAL PROTECTION PLAN-

#### General

It is significant to note that much of the code subjecting the requirement for abatement equipment to open-top-surface cleaners is based upon, and referencing in terms, the standard of "2.3 square meters, (25 square feet) for open-top-surface cleaners".

Bendix notes that its open top surface cleaning equipment ranges in size from  $1.5~\rm ft^2$ , to a max of  $8~\rm ft^2$ , with a mean average of  $5~\rm ft^2$  per unit. This represents an area 400% smaller in size than the open area code standard of  $25~\rm ft^2$  or more, which necessitates the use of free board chillers and/or other abatement measures.

It also notes that its open top surface cleaning operations are closely monitored to ensure that the open top covers are closed at all times when equipment is not in use to minimize any escapement of VOC emissions. Actual total daily operating time for any piece of equipment is less than one hour out of an eight-hour shift.

#### Plan

Bendix references Exhibit "A", "Equipment Compliance Summary". The following measures and/or changes have and/or will be instituted in Bendix Environmental Protection Program to further enhance its clean air effort effective on dates indicated.

#### Open-Top-Surface Cleaners

- o Unit No. 11, Baron Blakeslee, Model No. DP-4-2424. Presently using a TVOC solvent trichlor ethylene will be converted to use the VOC solvent 1.1.1 trichlor ethane effective April 29, 1983.
- o Unit No. 12, Phillips Degreaser, Movel No. 20-15005. Using TVOC solvent trichlor ethylene. Was decommissioned in December 1982 and stored in place. Unit will be put up for sale by mid-year or scrapped.



N. J. Department of Environmental Protection Newark, New Jersey April 13, 1983

- o Unit No. 14, Baron Blakeslee, Model No. MLW280 degreaser using a VOC solvent 1.1.1 trichloroethane will be decommissioned effective May 6, 1983 and stored in place.
- o Unit No. 15, Baron Blakeslee, Model No. MLW280 degreaser using VOC solvent 1.1.1 trichloroethane will be decommissioned effective September 30, 1983 and transferred to our Bendix Montrose Facility located in Montrose, Penn.
- o Unit No. 17, National Ultrasonic Cleaning degreaser using TVOC solvent trichloroethylene will be decommissioned effective May 30, 1983 and placed in storage for resale.

Bendix notes the above action items will effectively reduce the number of open-top-surface cleaners and their attendant emissions by 40 percent. Secondly, they will eliminate the use of TVOC as a solvent in these open-top-surface cleaners.

Further, although Bendix feels that the remaining units: 13, 16, 18, 19 and 20, whose free-board height measures approximately 58 percent plus, meet the intent of the code by being in an enclosed area not subject to drafts and cross-ventilation, it will increase the free-board height of these units to 75 percent by providing the proper stainless steel collars around the top opening. This action, according to EPA data relevant to free-board heights, will further reduce any emissions of VOC by 30 percent plus.

Bendix, as part of its procedures program for annual training and/or upgrading of employees' skills who may have the occasion to use open-top-surface cleaners, provided a two-hour training course during 1982 for over 200 employees to upgrade their skills in proper degreasing operations, maintenance, and safe handling practices of VOC solvents. As noted above, this is an ongoing program and ultimately results in less usage of solvent and emissions of VOC.



#### Guidance Systems Feterboro, M. J. 07808 **Division**

Fer (201), 288 2000

The Bendik Corporation

N. J. Department of Environmental Protection Newark, New Jersey April 13, 1983

Bendix believes that its foregoing environmental protection program which effectively reduces its emissions of VOC by over 50 percent, fully meets the intent and goals of the NJDEP's regulations for emissions of VOC, and will meet with the Department's early approval.

Thanking you again for your past cooperation and assistance in this matter, we remain

Very truly yours,

W. A. Hooper

Manager, Plant Engineering

William C. Hoopen

WAH:wr **Enclosures** 

Approved:

D. W/ Waby ielsen

Director of Operations

cc: Mr. A. Tumminello

Mr. Paul Eisen, Wapora, Inc.

EQUIPMENT COMPLIANCE SUMMARY

C. 7:27-16 et seq. OPEN TOP SURFACE CLEANERS STATUS AS OF APRIL 13, 1983

	(Vapo	r Dee	reas	ers)		-	· .	<u> </u>	.·.				
UNIT and/or STACK No.	11	12	13	14	15	16	17	18	19	20	21	22	·
BENDIX, TETERBORO, N.J.  Location-Dept., Make & Model No.  Part 16.4	Plating B.B. DP4-2424	Tumbliag Phillips 20-1500 S	Persh. Flow Solder B.B. LLLV	Persh. Potting B.B. MLW-280	FSO., DC10 B.B. MLW-280	Printed Circuits B.B. BK-320	Persh. Cleaning N.U.C.	Persh. Cleaning N.U.C.	TSD. Flow Solder B.B. MLW-280	TSD. Flow Solder B.B. MLW-120			
Solvent	Ţ	T	MC	MC	MC	MC	T	F	MC	MC			
(a.) Cover	Ċ	C	C	С	C	С	C	С	U	С	·		
(b.) Cleaner Top Opening- FT <sup>2</sup>	8	6	7	4	4	6	2	. 8	4	. 5			
(e.) 1. High Level Liquid Mark	С	C	C	С	С	C	С	С	C	С			
2. Rack or Mechanism	С	C	C	C	С	С	С	C	С	C			·
3. Wand Pressure	C	C	С	С	С	C	С	C	C	C			
4. Agitating System	*	*	*	*	*	*	*	*	*	*			: 
, 5. Free Board 75%	С	_	-	-		<b>-</b>	-	: : : <del>-</del>	-	-			
50% +	-	C	С	С	С	C	С	C	С	С			
6. High Level Vapor Mark	С	С	C,	С	С	С	C	С	С	С			
7. Local Exhaust	<del>XX</del>	××	**	**	**	**	**	**	**	**			
8. Positive Pressure	С	. c	С	С	С	С	С	С	С	С			
9. Condenser Cooling Water	С	С	С	С	ċ	C	С	С	С	С			L
10. High Temp. Liq. Shut Off	С	С	С	С	C	С	С	С	С	С			
11. High Temp. Vap. Shut Off	С	С	С	С	C	C	С	С	С	С			
12. Ref. Chiller Req. ***	C:	C	С	С	С	С	С	С	C	С			
(k.) Personnel Training	С	С	С	C	С	C.	С	C	С	С			
(1.) Oper. & Insp. Instructions	C	C	C	C	C.	С	С	C	С	С			

Legend:

\* None

\*\* Yes

\*\*\* Not Subject to NJAC. 7:26-16, e 11.

(Less than 25 FT<sup>2</sup>)

C Complying

Solvents:

(T) Trichloroethylene(F) Freon

(MC) Methyl Chloroform or 1.1.1. Trichloroethan

Unit Make: B.B. Baron-Blakeslee N.U.C. National Ultra Sonic Corp

# OPERATING AND GAUTION INSTRUCTIONS

# FOR OPEN TOP AND CONVEYORIZED DEGREASERS

# CAUTION

- 1. Do not smoke within 50 feet of a degreaser.
- 2. Advise supervisor of any excessive or unusual odors.
- 3. Operation of degreaser should be limited to trained personnel.
- 4. Wear protective equipment for hands and eyes if exposure to liquid is unavoidable.
- 5. Death can result from carelessness.

# OPERATING INSTRUCTIONS

- 6. Keep cover closed at all times except when processing work loads through the degreeser.
- 7. Minimize solvent carry out by the following measures:
  - Rack parts to allow full drainage.
  - Move parts in and out of the cagreaser at a vertical speed less than 11 ft/min.
  - Degrease the work load in the vapor zone at least 30 sec. or until condensation ceases.
  - Tip out any pools of solvent on the cleaned parts before removal.
  - Allow parts to dry within the degreaser for at least 15 sec. or until visably dry.
- 8. Do not degrease porous or absorbent materials such as cloth, leather, wood or rope.
- Work loads should not occupy more than half of the degreaser's vapor or open top area.
- 10. The vapor level should not drop mbre than 4 inches when the work load enters the vapor zene.

IMPORTANT: Vapor level must be kept at proper condenser level.

If level drops:

- Lbad is too large.
- Work is put in too fast.
- Degreaser is not up to proper heat.
- 11. Never spray above the vapor level.
- 12. Repair solvent leaks immediately, or shut down the degreaser.

13. Do not store solvent or dispose of waste solvent or transfer it to another party in such a manner that it will evaporate into the atmosphere. Store solvent and waste solvent only in closed containers.

Spent halogenated solvents are classified as hazardous material and must be properly disposed of in accordance with Federal, State and Local ordinances.

- Water should not be visably detectable in solvent exiting the water separator.
- 1S. Exhaust ventilation, if any, should not exceed 20 m³/min per m² (65 cfm per ft²) of degreaser open area, unless necessary to meet OSHA requirements. Fans should not be used near the degreaser opening.
- 16. Entrances and exits of conveyorized degreasers must be closed:
  - During heat-up and cool-down,
  - Immediately after the conveyor and exhaust are shutdown, and
  - Whenever work is not being processed for 15 minutes or longer.

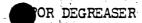
Covers must be removed just before conveyor and exhaust are started up.

 This label summarizing the operating and caution instructions #1 thru #16 shall be affixed on or near the degreaser.

2001 NO. JANICE AVE.
MELROSE PARK, IL 60160
(312) 450-3900
OFFICES IN ALL PRINCIPAL CITIES



Baron Blakeslee



#### N.J.A.C. 7:27-16.4 OPEN TOP TANKS AND SURFACE CLEANEBS

#### ADDITIONAL INFORMATION

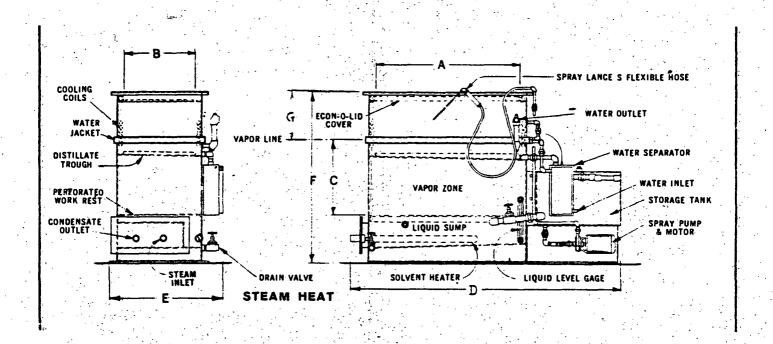
1. Manufacturer: Baron-RlakesleeModel # DP4-2424 Serial #24536 .

2. Date of Installation: July 1980

Capital Equip. # 001797

3., 4., 5. Specifications:

Location Plating / #11



	IN	SIDE		T 0	VERAL	Ĺ		SOLVE	ENT CAP.	CAIE.		•
MODEL	A	B	C.	D	E	F	G	BOIL	PINSE	SPRAY	HEATERS	٠
DP4		· .			1 1/							
2424	48	24	24	90	39	60	20	40	50	10		

6. Degreasing Solvent: <u>Trichloroethylene</u>

7. Cooling Water Temperature- In 50° Out 100°, GPM. 2

8. Lid: Mylar- roll type cover, normally in closed position, opened only when work is to be performed.

9. Agitator: Not Applicable

10. Flushing Wand: Yes x No , Max. Pressure at Tip: 10#

11. Solvent- Boiling liquid and vapor temperature: 188°F.. ThermostatControl

## ADDITIONAL INFORMATION - Continued Serial #24536 Capital Eq.#001797 Model #DP4-2424 12. Automatic High Temperature Shutoff Control: Liquid - Yes x Vapor - Yes x No. 13. High Level Liquid Mark: Yes x No High Level Vapor Mark: Yes x No 14. 15. Parts Leave Degreaser Completely Dry: Yes x Remarks: Manual operation, parts normally racked, cleaned, allowed to dry within degreaser. Physical Shape of Parts: Small Metal Parts 17. Local Exhaust: Hood , Lip Exhaust x 18. If No Local Exhaust - Nearest Exhaust Fan? - Not Applicable, all equipment has individual exhaust.

20. Air Pollution Control Equipment if Any, Describe: See Note # 1.

19. Positive Pressure Source: Open Door X Room Fan Air Cond.

21. Operating/Maintainance Instructions: See Attached

Note No. 1.

Bendix notes that all its vapor degreasing equipment utilizes an effective cold water, average temperature 53°F, cooling condenser. It is estimated that over 90% of all the vapors are contained within the degreaser. The small amount of residual vapors that may escape is either picked up by lip exhaust or hood method and vented to the atmosphere with no further filt-ration required.

Bendix further notes that its primary endeavor is the manufacture of Aerospace/Electronic Systems. Therefore, its requirements for vapor degreasing operations is minimal. It is estimated that its degreasing operations utilize less than 5%, 30-45 minutes, per unit during the normal eight (8) hour shift schedule. The open degreaser tank top is covered during all non-productive time.



FILE # 02-62-04

Guidance Systems Teterboro, N.J. 07608 **Division** 

Tel (201) 288-2000

The Bendix Corporation

Mr. John De Fina New Jersey Department of Environmental Protection Division of Waste Management 1259 Route 46 Parsippany, New Jersey 07054

July 30, 1984

Subject: Progress Report

Dear Mr. De Fina:

This will confirm and update our previous telephone report to you on June 14, 1984. As was previously reported, on June 5, 1984, while conducting a routine excavation for a new storage building in the proximity of an underground hexane tank which is no longer in service near the center of Bendix' property in Teterboro, New Jersey, a small quantity of lightweight, black, oily liquid mixed with water began to seep from a section of the wall of an excavated trench which was approximately four feet deep. This liquid/water mixture collected at the bottom of a portion of this trench to a depth of two or three inches.

We immediately contacted and retained ENSI, Inc. to assist us in determining the type of immediate measures which should be taken to prevent any spread of this material. Upon ENSI's advice, we placed oil-absorbent pads into the trench to absorb this oily liquid. We then back-filled the trench and covered it with a tarp to prevent the runoff of this material from the trench in the event of a heavy rain. We also placed an oil-absorbent boom around the south, west and east sides of the trench area to further prevent any possible runoff of this material. It is noted that the ground has a slight north-to-south gradient at this site.

Attachment K



July 30, 1984

Page 2.

We also prepared a general scope of work regarding an underground eurvey of this site and solicited proposals from four different professional environmental consulting firms. Each firm propesed its own specific plan. their preposal and experience in this eree, we selected the Leggette, Brashears and Graham, groundwater geologists, from Wllton, Connecticut to perform the initial drilling and sampling required to determine the exact nature and location of this material. technical proposal is enclosed for your reference.

After obtaining required drilling permits, Leggette, Brashears and Graham, Inc. mobilized on the eite on July 20, 1984. They began the drilling of sampling wells on July 23, 1984.

We will submit a supplemental report after completion of this initial phase of the work outlining our consultant's findings. In the interim, should you have any questions, please contact

Very truly yours,

Nilliam C. Cooper William A. Hooper

Plant Engineer

WAH/mlf

Enclosure





#### HYDROGEOLOGIC INVESTIGATION ALLIED BENDIX AEROSPACE TETERBORO, NEW JERSEY

#### INTRODUCTION

In July 1984, Leggette, Brashears and Graham, Inc. (LBG) was retained by Allied Bendix Aerospace to investigate ground-water conditions at their Teterboro, New Jersey facility. This action was taken in response to an earlier discovery that ground-water contamination had occurred in an area formerly used for the storage of solvents and other hydrocarbons.

The purpose of the study undertaken by LBG was to 1) investigate the nature of the shallow subsurface sediments in the area of known contamination, 2) delineate the direction and rate of ground-water flow in these sediments, and, 3) define both the chemical nature and areal extent of contamination.

#### LOCAL GEOLOGY

Physiographically, the Teterboro area is characterized by low-lying, flat topography dominated by tidal marshland at an elevation less than ten feet above mean sea level. This setting is the result of the stagnation and recession of the last stage of continental glaciation. In this area of New Jersey, large glacial lakes were formed by the damming of streams by glacial ice. Following the retreat of the ice sheet and draining of these lakes, the flat-lying, fine-grained lake bed sediments were exposed to both marine and fluvial action. The net result of these processes was the creation of horizontally-extensive deposits of laminated fine silts and clays, overlain by a cover of mixed fine to coarse silty sands. The subsequent establishment of marsh

vegetetion teate en erganic layer ded ing roots and other plant remains, which now blankets the underlying sediments.

The drilling program conducted at the Bendix plant confirmed the existence of this general stratigraphy. Most borings retrieved a rich black organic soil horizon overlying approximately 4 to 7 feet of silty, fine to medium gray sand. These sands are in turn underlain by a uniform and horizontally extensive, dense, laminated (varved) olay interbedded with very thin silt lenses. At the study site, these clays exceed 160 feet in thickness. The varved clay forms a substantial confining layer, thus limiting the shallow water table at the plant site to the overlying silty sands.

#### DRILLING PROGRAM

#### Drilling and Sampling

The drilling program was designed to determine the extent of physically-noticeable ground-water contamination. This was accomplished through a series of soil borings which were drilled radially outward from the known zone of contamination, as shown by figure 1.

Drilling was begun under LBG supervision on July 23, 1984 by Empire Soil Investigations, Inc. using 6-inch I.D. hollow-stem augers. Continuous split-spoon samples were taken and examined from grade until the confining clay stratum was encountered. A total of 18 test borings were advanced during the shallow drilling program, with 10 of these completed as monitor weils. The remaining borings were backfilled with bentonite. In addition, one deep well (A3D) was drilled using a combination of 10-inch and 3-inch I.D. hollow-stem augers in an attempt to determine the thickness of the confining clay layer and the nature of any deeper aquifer system. However, after logging dense laminated clay from 4 feet to 51 feet below grade, this hole

was terminated and backfilled with a cement/bentonite slurry. A well log from a plant supply well in the site vicinity showed 162 feet of clay. With this thickness of clay it was concluded that contamination of any lower aquifer via surface infiltration at the plant site was highly unlikely. Complete geologic logs of each borehole are in Appendix I.

### Well Construction

The 10 monitor wells were constructed using 4-inch thread-jointed PVC pipe. Since the water-table sediments are less than 5 feet thick in most locations; the wells generally consist of a single, bottom-capped 5-foot section of 4-inch, 10-slot (0.010 inch) PVC screen. The annular space surrounding the screen was packed with coarse sand (No. 1 Morie), and a protective steel gate box was cemented in place to isolate the PVC casing from possible surface damage. A schematic diagram of a typical monitor well installation is shown in figure 2 and a summary of well construction details is presented in table 1. Following completion, each well was developed by suction pumping.

#### HYDROGEOLOGY

Synoptic water-level measurements were taken on July 25 and August 8, 1984 in each well and converted to elevation above mean sea level. The resulting water-table contour maps are shown in figures 3 and 4. These maps indicate a hydraulic gradient ranging from 0.005 to 0.021 ft/ft, with a value of 0.015 ft/ft being most representative of the study site. The direction of ground-water movement is generally characterized by a radial flow component to the north, northwest, and southwest. The central ground-water mounding phenomenon evident on these maps may be due to localized recharge of the excavated area and what was previously open area which is surrounded by an impervious asphalt cover at

in hydraulic grad te between each map are likely the result of changing ground-wat ditions related to previous precipitation events. It is apparent that direct infiltration of precipitation has a major influence over water levels and flow petterne ia the site vicinity. Between July 25 and August 8, during which there was about 1.5 inches of rainfall, water levels rose about n.2 foot in Welle C, D, and E in the peved area. Welle A and B near the excevetsd area rose 0.5 foot and Welle B4, A3s and F in the grassy field rose over 1.0 foot during the same period.

An hourly series of water-ievel measurements were taken in Moniter Wells B, D and I2 to determine if ground-water fiow at the site is influenced by tidal fluctuations in the Hackensack River. exhibit the same six-hour periodicity as the tidal cycle, Tidal flustontions in though with a lag time. The study site is over one and a half miles from the nearest tidal influence and no effecte on shallow weter-table levels should occur. Over the course of eight hours, a deviation of less than 0.06 foot was observed, with one well exhibiting a contrary trend, suggesting that these variations were most likely not the resnit of tidal activity. Farthermore, these small fluctuations in water levels would not have a significent effect on ground-water flow at the study slte.

Although water levele and directions of flow have only been measured in the immediate site, it is likely that the ground water discharges to the drainage ditches berdering the plant. The invert elevations are reported to be about 0.5 foot above mean sea level, or lower than warer ievels in Permeability

An investigation of the permeebility (hydraulic conductivity) characteristice of the shallow sediments was conducted on six of the monitor wells. Psrmeability testing involves lowering the ter level in a we by anmping or bailing, to a known depth and measuring the rate of recovery. The data obtained was analyzed using two different methods, one developed by Hvorslev (1951) and the other derived by Bower and Rice (1976). The results, summarized in table 2, indicate coefficients of permeability ranging from 22 to 138 gpd/ft<sup>2</sup> (gallons per day per square foot). The most representative permeability value was 105 gpd/ft<sup>2</sup> or 14 ft/day, which is a reasonable value for silty sands. In the cgs system, this value is equivalent to a hydraulic conductivity of about 5 x 10<sup>-3</sup> cm/sec.

# Ground-Water Seepage Velocity

The average rate of ground-water flow through a uniform porous water-bearing material can be calculated using the relationship:

$$v = \frac{Ki}{n}$$

where,

v = average seepage velocity, ft/day

K = coefficient of permeability, ft/day

i = hydraulic gradient, ft/ft

n = porosity, (dimensionless decimal fraction)

From the permeability tests and water-table contour maps, average yalues of 14 ft/day and 0.015 ft/ft were used to represent K and i, respectively. The porosity of silty sands has generally been estimated from other studies to be in the range of 0.2 to 0.3, with the average value of 0.25 selected for this analysis. Using these values, the estimated seepage velocity is:

$$v = \frac{(14 \text{ ft/day}) \times (0.015 \text{ ft/ft})}{0.25}$$

= 0.84 ft/day

Therefore, an average rate of ground-water flow of approximately 1 ft/day is believed to be reasonable for this shallow water-table unit. This velocity is dependent on the very localized ground-water gradient and sediment permeability.

# Flow Net and Water Budget

Using the information obtained from the water contour maps and calculations of permeability and hydraulic gradient, it is possible to construct a simplified flow net for Flow nets are two-dimensional graphic the study site. analytical models which can provide important insights into the hydrodynamics of a water-bearing unit. Using watertable elevations from monitor well measurements, lines of ground-water flow are drawn perpendicular to each watertable contour line (which represent equipotential hydraulic head values). These flow lines are constructed such that equal "tubes" or "pipes" of water flow are created. approximate volume of ground-water flow through each tube can be calculated, and the summation of discbarge through all tubes equals the total ground-water flux in that portion of the saturated sediments:

Figure 5 shows the flow net created for the study site using water-table elevations obtained on August 8, 1984. Flow through each segment of the flow tube is calculated using the following formula; a version of Darcy's Law:

$$dQ = K dh \frac{dm}{ds}$$

where,

dQ = ground-water discharge flux, ft<sup>2</sup>/day

K = permeability, ft/day

dh = change in head between each bounding
 contour interval, ft

dm = length of flow tube section, ft

ds = width of flow tube section, ft

For this analysis, 14 ft/day and 0.90 foot were used for K and dh, respectively. Values of dm and ds were determined specifically for each flow tube. Using the above method, the ground-water flux through this portion of the saturated sediments was calculated at 140 ft<sup>2</sup>/day. To obtain the total volume of ground-water discharge, the ground-water flux is multiplied by the saturated sediment thickness. Using a maximum value of 5 feet for the sediments overlying the confining clay layer yields a discharge volume of approximately 700 ft<sup>3</sup>/day or about 5200 gpd (gallons per day) moving through the study area.

As an additional check on this analysis, a simplified water budget was estimated for the study site. This was calculated using the formula:

$$Q_{T} = [P_{T} - (E_{+} + R)] A + I$$

where,

 $Q_m = total ground-water discharge, ft<sup>3</sup>/day$ 

 $P_{\mathbf{r}}$  = average daily precipitation, ft/day

 $E_{+}$  = average daily evapotranspiration loss, ft/day

R = average daily runoff loss, ft/day

 $A = area of study, ft^2$ 

I = ground-water inflow from adjacent areas

For this portion of New Jersey, average annual precipitation is approximately 41 inches and losses due to evapotranepiration and direct runoff have been estimated at 50-60 percent and 20-25 percent of total annual precipitation, respectively. This results in an average infiltration into the area shown on figure 5 encompasses 84,000 ft<sup>2</sup>.

Therefore, using the previous equation, total ground-water discharge at the study site is estimated at between 160 ft<sup>3</sup> and 240 ft<sup>3</sup> per day (1200-1800 gpd). However, it is important to note that the quantity of greund-water inflow (I) contributed to the site from edjacent areas is an culated into the previous estimation. It is possible that exceeding that calculated for the study area alone

In light of the simplifying assumptions necessary in calculating ground-water discharge using the flow net and the water budget methods, the values of 1800 gpd derived from the water budget and 5200 gpd derived from the flow net are considered to be in relatively good agreement. As a safe water discharge at the study site is most likely less than

# GROUND-WATER QUALITY

Ground-water sampling was conducted on August 14, 1984.

Prior to sampling, appreximately 3 well volumes of water were removed from each monitor well using a suction pump.

Were used to obtain samples from each well. All ten wells and a field blank were analyzed by Environmental Testing and cand grease. In addition, Monitor Wells D. L. A3S, and 12 were tested for PCBs (polychlorinated biphenols) and 13

heavy metals. The pertinent results of the analyses are summarized in table 3. Appendix II contains a summary of all of the laboratory data.

Of the thirty-three volatile organic compounds analyzed for, fourteen were detected in one or more samples and five of the thirteen metals were detected. No PCBs (Aroclors on the ETC analysis reports) were detected, and oil and grease was detected at low levels in two wells. Hexane was not detected, although the laboratory maintains that their minimum detection limit for this compound is 25 milligrams/liter.

The reason for this relatively high minimum detection limit is due to hexane's strong affinity for remaining in the dissolved state. As a result, analysis for hexane in water requires the direct injection technique, a method which limits the sensitivity of detection thresholds.

of the five metals detected only arsenic is at levels which exceed drinking water criteria in New Jersey. It should be noted that these samples were not filtered and that metals have a high affinity for soil particles. Actual concentrations of arsenic in the ground water under laminar, non-turbid flow may be much lower. Contamination of the ground water by metals is therefore not considered a problem at this location. Similarly, the low levels of oil and grease detected in Wells D and I2 are not indicative of widespread contamination and might presumebly have been caused by the drilling equipment lubrication.

Contamination of the ground water by volatile organic compounds appears to be eomewhat localized, though the southerly and northerly limits for significant levels of these compounds has not been established by the field program. Additional exploration to the north is restricted by the buildings. Further investigation to the south was not undertaken because the soil and ground water appeared to be free of evident contamination. Figure 6 shows the total concentrations of volatile organic constituents in the wells

based on the one sampling round. It should be noted that the field blank, prepared in the chemical treatment plant, exhibited 69 ug/l (micrograms per liter) of total volatiles. This could be caused by the presence of volatile constituents in the air or air-borne dust during the sampling process, or could possibly be a result of laboratory error. The three substances found in the blank sample are the same three which the lab reported poor recovery percentages of in their quality control procedures. Accordingly, levels bf contaminants below or near to this level should be viewed with suspicion.

Of the fourteen detected volatile compounds only seven appear to be widespread. These are 1,1 dichloroethane, methylene chloride, toluene, 1,2 trans-dichloroethylene, 1,1,1 trlchloroethane, trichloroethylene and vinyl chloride.

The presence of vinyl chloride is somewhat pnzzling if not explainable by biodegradation. Current research is divided on the issue of biotransformation of the chloroethylenes, but there seems to be some evidence that a very slow process may occur which will degrade tetrachlorbethylene to its more simple trichloro, dichloro and monochloro (vinyl chloride) forms.

The pattern of total volatile constituents shown by figure 6 indicates that the area of significant contamination (over 100 ug/l total constituents) is confined to the area east of Well L and west of Wells I2 and F. However, the northern and southern limits are apparently beyond the area investigated by the field program. No significant occurrences of free-phase hydrocarbons were observed, except for a minor hydrocarbon sheen on the sample from Well E.

# FATE OF THE AFFECTED GROUND WATER

The direction and rate of flow of the ground water outside of the study area is not known at this time. However, it is probable that the water migrates towards the

drainage ditches bordering the facility. It also will have a minimal vertical component of flow into the clay layer. The reduction in contaminant concentrations in the study area are due primarily to dilution by water in storage and by infiltrating rainfall. Other factors which affect reductions include attenuation by soil particles and biotransformation. Assuming that there are no other sources of volatile organics, the ground-water probably would meet a drinking water criteria prior to discharge off of the property.

The ground and surface-water runoff from the plant enters the drainage ditches and flows south to a holding pond from which it is pumped to Berry Creek. It then flows to the Hackensack River. Once in the surface-drainage pattern any remaining organic constituents would be subject to volatilization and other factors.

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CONCLUSIONS

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- 1. The shallow ground-water flow at the study site is confined to the upper five feet of relatively permeable sediments by a thick and dense clay layer. Vertical migration of the affected ground water is minimal and impacts on deep aquifer zones are very unlikely.
- 2. The contaminated ground water appears to be localized in extent.
- 3. The ultimate fate of the ground water originating at the site is the surface-drainage system leading to the Hackensack River. Physical, chemical and biological factors

probably combine to reduce the levels of contaminants to acceptable water criteria prior to discharge from the

LEGGETTE, BRASHEARS & GRAHAM, INC.

Paul x Hydrogeologist

Robert Lamonica, cre Associate

October 8, 1984

Disk: rgsl0b

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TABLE 3

ALLIED BENDIX AEROSPAOE TETERBORD, NEW JERSEY

Bummaty of Water-Quality Analyses

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Attachment

LEGGETTE, BRABHEARB & GRAHAM, IN



# State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WATER RESOURCES CN 029 TRENTON, NEW JERSEY 08625

GEORGE G. McCANN, P.E.
DIRECTOR

OIRK C. HOFMAN, P.E. DEPUTY DIRECTOR

Water Quality Management

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

Mr. William A. Hooper, Plant Manager Allied Bendix Corporation U.S. Route 46 Teterboro, N.J. 07608

DCT 24 1986

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Dear Mr. Hooper

RE: NJPDES Permit No. NJ00 02097 Effective Date: December 1, 1985

Enclosed is the final NJPDES/SIU and DSW Permit modification to discharge pollutants to the Bergen County Utilities Authority and to Berry's Creek, classified as SE2 waters, issued in accordance with the New Jersey Pollutant Discharge Elimination System Regulations, N.J.A.C. 7:14A-1 et seq. Violation of any condition of this permit may subject you to significant penalties.

Within 30 calendar days following your receipt of this permit, under N.J.A.C. 7:14A-8.6 you may submit a request to the Administrator for an adjudicatory hearing to reconsider or contest the conditions of this permit. Regulations regarding the format and requirements for requesting an adjudicatory hearing may be found in N.J.A.C. 7:14A-8.9 through 8.13. The request should be made to:

Administrator
Water Quality Management Element
Division of Water Resources
CN-029
Trenton, New Jersey 08625

Application for renewal of this permit must be submitted at least 180 days prior to expiration of this permit pursuant to N.J.A.C. 7:14A-2.1(f)5.

A set of self monitoring report forms are attached for your use. Please make copies according to your need.

If you have any questions on this action, please contact Gary Torres at (609) 292-4860.

Sincerely,

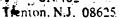
Paul C. Kurisko, P.E., Chief Bureau of Industrial Waste Management Water Quality Management

WQM181:gjt





# STATE OF NEW JERSEY ENT OF ENVIRONMENTAL PROTECTION \* CN 402





58:10A-1 et sec



### PERMIT

The New Jersey Department of Environmental Protection grants this permit in accordance with your application, attachments accompanying same application, and applicable laws and regulations. This permit is also subject to the further conditions and stipulations enumerated in the supporting documents which are agreed to by the permittee upon acceptance of the permit. **Expiration Date** Issuance Date . 11/29/83 Effective Date: 1/15/84 Pennit No. Modification: 10/22/86 Modification: 12/1/86 January 14, 1989 NJ0002097

Name and Address of Owner Location of Activity/Facility Name and Address of Applicant US Highway 46 The Bendix Corporation Same as applicant U.S. Highway 46 Teterboro Borough, Bergen County New Jersey Teterboro, NJ 07608 Application No. Statute(s) Type of Permit Issuing Division N.J.S.A. NIPDES/DSW-SIU Modification Water Resources

This permit grants permission to:

Discharge pretreated industrial wastes into the Bergen County Utilities Authority via Teterboro sewers, in accordance with effluent conditions, monitoring requirements, and other conditions set forth in modified Pages 18 and 19, Part IV hereof and to Berry's Creek in accordance with additional pages 25, 26, 27, and 28 of Part V hereof.

This Permit replaces Pages 18 and 19 of the NJPDES/DSW-SIU Permit Issued November 29, 1983, and ammends pages 25, 26, 27, and 28 thereto.

Remaining requirements and limitations of that Permit or of the October 31, 1984 NJPDES/DSW/ IWMF/SIU Permit Modification are unchanged by this NJPDES/DSW-SIU Modification.

This permit modification does not include any NJPDES discharge to ground water (DGW) permit required in accordance with N.J.A.C. 7:14A-1 et seq. Also, this permit modification does not constitute a waiver from obtaining a NJPDES-DGW permit as per section 10.7 of the NJPDES Regulations. The Department reserves the right to modify this DSW-SIU permit modification at any time to include a DGW permit section.

Approved by the Denartment of F Protection

By the Authority of: George G. McCann, P.E.

Acting Director

Division of Water Resources

Water Quality Management

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Page 1 of 1
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#### GHBCKLIST OF PARTS AND MODULES COMPRISING THIS HUPDES PERMIT

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2.	Checklist		
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	V - Part	V (special)	

Part IV
Page 18
Permit No. NJ0002097
Modified September 1986

During the period beginning EDPM and lasting through January 14,1989, the permittee is authorized to discharge from discharge point(s) designated as: DSNOOIL

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETEHS	DISCHARGE I	IMITATIONS	MONITOR	ING REQUIREME	ENTS
All units in mg/l	MONTHLY	DAILY	MEASUREMENT	SAMPLE	REPORTING
unless otherwise	AVERAGE	MAXIMUM	FREQUENCY	TYPE*	FREQUENCY
specified	· · · · · · · · · · · · · · · · · · ·	•			
FLOW	_	Monitor On	ly Contiumous	Continuous	Quarterly
CDD			ly Quarterly	Composite	Quarterly
CAEMIUM, TOTAL	.26	.69	Quarterly	Composite	Quarterly
CHROMIUM, TOTAL	1.71	2.77	Quarterly	Composite	Quarterly
COPPER, TOTAL	2.07	3.38	Quarterly	Composite	Quarterly
LEAD, TOTAL	0.43	0.63	Quarterly	Composite	Quarterly
NICKEL, TOTAL	2.38	3.98	Quarterly	Composite	Quarterly
SILVER, TOTAL	0.24	0.43	Quarterly	Composite	Quarterly
ZINC, TOTAL	1.48	2.61	Quarterly	Composite	Quarterly
CYANIDE, TOTAL		0.5	Quarterly	Composite	Quarterly
TOTAL TOXIC ORGANICS		2.13	Quarterly	Grab	Quarterly
ARSENIC, TOTAL	0.002	0.010	Quarterly	Composite	Quarterly
CHRCMIUM, HEXAVALENT	0.025	0.123	Quarterly	Mult.Grab	**Quarterly
MERCURY, TOTAL	0.001	0.002	Quarterly		Quarterly
PHENOLICS, TOTAL	0.01	0.05	Quarterly	Mult.Grab	**Quarterly
BOD		(1)	Quarterly		Quarterly
TSS		(1)	Quarterly	Composite	Quarterly
COLOR (Pt-Co UNITS)	· · · · · · · · · · · · · · · · · · ·	500	Quarterly		Quarterly
TOTAL KJENDAHL NITROGEN		200	Quarterly		Quarterly
AM ACNIA NITROGEN	-	100	Quarterly		Quarterly
OIL AND GREASE (Non-pet)		200	Quarterly		**Quarterly
PETROLEUM HYDRDCARBONS	100	<b>i50</b>	Quarterly	Mult.Grab	**Quarterly
pH Range (Standard Units	5)	5.5-10.5	Continuous	N/A	Quarterly
EXPINSIVITY		(2)	See Note	See Note	Quarterly

Where more than one measurement is required in a reporting period, both the average and maximum values must be reported (pH: report minimum and maximum values).

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following locations: DSNOOIL (Formerly DSNOOIB); sump in wastewater treatment building.

- (1) BCUA must be notified if over 350 mg/1.
- (2) Maximum of 5% LEL on any two successive readings. Maximum of 10% LEL any one reading. Sample twice per 8 hours.
- \*All composites flow proportional.
- \*\*All multiple grabs consist of one grab each 8 hours.
- FDPM means "the effective date of this permit modification".

nge 19 mit No. NJ0002097 Nified July 1986

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The term "TTD" shall mean total toxic organics, which is the summation of all quantifiable values greater than .01 milligrams per liter for the following toxic organics:

Napthalene
Acenaphthene
Acrolein
Acrylonitrile
Acrylonitrile
4-nitrophenol
```

Acrylonitrile Renzene Benzidine Carbon Tetrachloride (tetrachloromethane) Chiorobenzene 1,2,4-trichlorobeniene Hexachlorobenzene 1,2,-dichloroethane 1.1.1-trichloroethane Hexachloroethane 1,1-dichloroethane 1,1,2-trichloroethane 1,1,2,2-tetrachloroethane Chloroethane Bis (2-chloroethyl) ether 2-chloroethyl vinyl ether (mixed) 2-chloronaphthalene 2,4,6-trichlorophencl

Parachloroneta cresol Chloroforn (trichloromethane) 2-chlorophenol 1,2-dichiorobenzene 1,3-dichlorobenzene 1.4-dichlorobenzenc 3,3-dichlorobenzidine 1,1-dichloroethylene 1,2-trans-dichloroethylene 2,4-dichlorophenol 1,2-dichloropropane (1,3-dichloropropene) 2,4-dimethylphenol 2,4,-dinitrotoluene 2,6-dinitrotoluene 1,2-diphenylhydrazine Ethylbenzene Fluoranthene 4-Chlorophenyl phenyl ether 4-Bromophenyl phenyl ether Bis (2-chloroisopropyl) ether Bis (2-chloroethoxy) methane Methylene Chloride (dichloromethane) Methyl Chloride (chloromethane) Methyl Bromide (bromomethane) Bromoform (tribromomethane) Dichlorobromomethane Chlorodibromomethane Hexachlorobutadiene Hexachicrocyclopentadienc

Isophorone

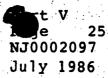
4-nitrophenol 2,4-dinitrophenol 4,6-dinitro-o-cresol N-nitrosodimethylamine N-nitrosodiphenylamine N-nitrosodi-n-propylamine Pentachlorophenol Phenol Bis (2-ethylhexyl) phthalate Butyl benzyl phthalate Bi-n-butyl phthalate. Di-n-octyl phthalate Diethyl phthalate Dimethyl phthalate 1.2-benzanthracene % | (benzo (a)anthracene) Benzo(a)pyrene (3,4-benzopyrene) 3,4-Benzofluoranthene (benzo(b) fluoranthene) 11,12-Benzofluoranthene (Benzo(k)fluoranthene) Chrysene Acenapthylene Anthracene 1,12-Benzoperylene (Benzo(ghi)perlene) Fluorene Phenanthrene 1,2,5,6-Dibenzanthracene (Cibenzo(a,h)anthracene) indeno(1,2,3-cd) pyrene (2,3-o-pheniene pyrene) Tetrachloroethylene Toluene Trichloroethylene Vinyl chloride (chloroethylene): Aldrin Dieldrin Chlordane (technical mixture and metabolites) 4,4-DDT 4,4-DDE (p,p-DDX) 4,4-DDD (p,p-TDE) Alpha-endosulfan Beta-endosulfan Endosulfan sulfate Endrin Endrin aldehyde Heptachlor Heptachlor epoxide (BHC-hexachlorocyclohexane) Alpha-BHC

(PCS-polychlorinated biphenyls)
PCB-1242 (Arochlor 1242)
PCB-1254 (Arochlor 1254)
PCB-1221 (Arochlor 1221)
FCE-1232 (Arochlor 1232)
PCB-1248 (Arochlor 1248)
PCB-1260 (Arochlor 1260)
PCB 1016 (Arochlor 1216)
Toxaphene
2,3,7,8-Tetrachlorodibenro-p-dioxin (TCDD)

Since monitoring data for the facility indicate that only seven of the above substances are present in significant consentrations, monitoring is specifically required only for these seven: Bromodichloromethane, Methylene Chloride, 1,1,1-Trichloroethane, Trichloroethylene, Toluene, Trans 1,2-Dichloroethylene and 1,1-Dichloroethane, The permittee shall certify non-use of the remaining compounds quarterly, or monitor for any such substance which has begun to be used on site. Intention to begin use of any such substance shall be reported to the Division 90 days before use.

Beta-BHC

Gamma-BHC Delta-BHC



# 1. Additional Discharge and Operating Requirements

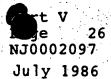
- A. The permittee shall comply with all applicable rules, regulations or ordinances of the Bergen County Utilities Authority. Any violation of those provisions shall also be considered to be a violation of this permit.
- B. If subsequent to the issuance of this permit a Categorical Pretreatment Standard is promulgated which is applicable to one or more of the permittee's operations, then within 180 days of the effective date of the applicable Categorical Pretreatment Standard(s) the permittee must submit a Baseline Monitoring Report (BMR) in accordance with 40 CFR 403.12(b). The BMR shall be submitted to the address in Paragraph 2.A. below. The permittee shall conform to the applicable standards within the compliance period provided for in the regulations.

# 2. Discharge Monitoring Reports

A. In addition to the discharge monitoring reports submitted to other parties specified above, the permittee shall also submit a copy of the monitoring reports to the DTW at the following address:

Bergen County Utilities Authority
Box 122
Foot of Mehrhof Road
Little Ferry, New Jersey 07643

B. Submission of Monitoring Reports. Monitoring results obtained during the previous 3 month(s) shall be summarized and reported on the appropriate form(s) specified by the Department. Monitoring reports are due on the first day of the month following the completed reporting period and shall be postmarked no later than the 25th day pf that month.



# 2. ADDITIONAL SURFACE WATER QUALITY REQUIREMENTS

The permittee shall discharge so as not to violate Surface Water Quality Standards for Berry's Creek, classified as SE2 Waters, pursuant to N.J.A.C. 7:9-4.1 et seq., including, but not limited to, the following:

- A. Floating, Colloidal, Color and Settleable Solids; Petroleum Hydrocarbons and Other Oils and Greases
  - 1. None noticeable in the water or deposited along the shore or on the aquatic substrata in quantities detrimental to the natural biota. None which render the waters unsuitable for the designated uses.
  - 2. For "Petroleum Hydrocarbons" the goal is none detectable utilizing the federal EPA-Environmental Monitoring and Support Laboratory Method (Freon Extractable-Silica Gel Absorption-Infrared Measurement); the present criteria, however, are those of paragraph 1. above.

# B. Temperature Deviations

No thermal deviations which would cause temperatures to deviate more than 2.2 degrees Celsius (4 degrees Fahrenheit) from ambient during September through May, or by 0.8 C (1.5 F) during June through August, nor shall temperatures exceed 29.4 C (85 F).

C. Dissolved Oxygen (mg/1)

Not less than 4.0 at any time.

D. Fecal Coliforms ( Number per 100 ml )

Not to exceed a geometric average of 770.

E. pH (Standard Units)

6.5 to 8.5

F. Total Dissolved Solids (Filterable Residue)

Not to exceed 500 mg/l or 133 per cent of background, whichever is less.

G. Turbidity (Nephelometric Turbidity Unit - NTU)

Maximum 30-day average of 10 NTU, a maximum of 30 NTU at any time.

# H. Suspended Solids (Non-filterable Residue) (mg/1)

None which would render the water unsuitable for designated uses.

# I. Ammonia, Un-Ionized, 24 Hour Average

Not to exceed 0.1 of acute definitive LC50 or EC50.

# J. Toxic or Hazardous Substances

- 1. Allowing for natural conditions, none, either alone or in combination with other substances, in such concentrations as to affect humans or be detrimental to the natural aquatic biota, produce undesirable aquatic life, or which would render the waters unsuitable for the designated uses.
- 2. Toxic substances shall not be present in concentrations that cause acute or chronic toxicity to aquatic biota, or bioaccumulate within an organism to concentrations that exert a toxic effect on that organism or render it unfit for consumption.
- 3. The concentrations of non-persistent toxic substances in the State's waters shall not exceed 0.05 of the acute definitive LC50 or EC50 value, as determined by appropriate bioassays, nor shall concentrations of persistent toxic substances exceed 0.01 of acute definitive LC50 or EC50 value.

4. Concentrations of the following substances in the State's waters are among those specifically limited:

Substance	Not to	exceed ( ug/l )
Aldrin/Dieldrin	0.0019	
Benzidine	0.1	
Chlordane	0.004	
Chlorine, Total Residual	10	
DDT and Matabolites	0.001	
Endosulfan	0.0087	
Endrin	0.0023	
Heptachlor	0.0036	하는 하네가 아름이 되었다.
Lindane	0.004	
Polychlorinated Biphenols (PCB's)	0.03	
Toxaphene	0.005	

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July 1986

K. The permittee shall discharge so as not to violate Hackensack Meadowlands Development Commission (HMDC) Water Quality Regulations promulgated pursuant to the authority of N.J.A.C. 19:4-6.14 et seq.

The HMDC Regulations include, but are not limited to, the following provisions:

The flow from any pipe, conduit, or any other source discharging into the River or its tributarities shall meet the following values:

- Five Day B.O.D. not to exceed 25 mg/1 during any period of discharge;
- Turbidity shall not exceed 40 Jackson Turbidity Units based upon SiO2;
- 3. Color shall not exceed 40 standard units based on Platinum Cobalt color:
- 4. Temperature shall not be greater than 85 F;
- 5. Nitrogen (Total) shall not exceed 30 mg/l;
- 6. Suspended Solids shall not exceed 40 mg/l by weight;
- 7. Phosphates shall not exceed 30 mg/l;
- Phenols shall not exceed 0.2 mg/l; and
- 9. Toxic substances shall be kept to as low a value as is consistent with current technological practice representing the highest state-of-the-art and levels consistent with recreational and primary contact water.

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
1474 PROSPECT STREET
P.O. BOX CN-029
TRENTON, NEW JERSEY 08625

#### SIU FACT SHEET

FOR DRAFT NJPDES PERMIT TO DISCHARGE INTO:
Bergen County Utilities Authority Wastewater Treatment Plant,

Allied Bendix Aerospace
HAS APPLIED FOR A NEW JERSEY POLLUTANT DISCHARGE ELIMINATION
SYSTEM (NJPDES) PERMIT, TO THE DEPARTMENT OF ENVIRONMENTAL
PROTECTION TO DISCHARGE INTO THE ABOVE DESIGNATED DOMESTIC
TREATMENT WORKS.

DATE MODIFICATION REQUEST RECEIVED: 3/25/85

NJPDES NO. NJ0002097

NAME AND ADDRESS OF APPLICANT:

Allied Bendix Aerospace
Bendix Guidance Systems Division
U.S. Route 46
Teterboro, NJ 07608
F FACILITY WHERE DISCHARGE OCCURS

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:
Same as applicant

RECEIVING COLLECTION SYSTEM (IF DIFFERENT FROM DTW):
Teterboro sewer system

DESCRIPTION OF FACILITY OPERATIONS:

The applicant is a manufacturer of aviation and aerospace components. Applicable SIC Codes are 3662, 3728, 3761 and 3811.

Discharge 001 to Bergen County Utilities Authority consists of sanitary, non-contact cooling, tumbling and boiler blowdown, 0.1 MGD.

Discharge 002B to BCUA consists of metal finishing wastewater. This modification effects end-of-pipe monitoring and limitations for DSN 002B only.

Discharge 002A, 003, 004, 005 and 006 end-of-pipe limitations are unaffected by this modification. Revised Water Quality Standards (in stream) for Berry's Creek have been included, however, although no additional monitoring is required as a result of this inclusion.